

---

**From:** Wu, Jennifer  
**To:** Peterson, Erik  
**Sent:** 7/1/2014 2:25:32 PM  
**Subject:** RE: Oregon CZARA Pesticides information

Thanks, Erik! I added your comment categories - everything looks good.

---

**From:** Peterson, Erik  
**Sent:** Monday, June 30, 2014 5:06 PM  
**To:** Wu, Jennifer  
**Subject:** RE: Oregon CZARA Pesticides information

Jenny,

I have assigned comment categories to the comment letters I worked on, in the attached spreadsheet.

Sorry about the formatting, still some bullets in there, hope it doesn't cause you too much trouble. I look forward to the next step.

Erik Peterson  
Office of Ecosystems, Tribal and Public Affairs  
EPA Region 10 - Seattle  
[peterson.erik@epa.gov](mailto:peterson.erik@epa.gov)  
206-553-6382

**From:** Wu, Jennifer  
**Sent:** Thursday, June 26, 2014 6:07 PM  
**To:** Helder, Dirk; Henning, Alan; Peterson, Erik; Woodruff, Leigh  
**Cc:** Carlin, Jayne; [allison.castellan@noaa.gov](mailto:allison.castellan@noaa.gov); Rueda, Helen  
**Subject:** Oregon CZARA Pesticides information

Hi Everyone (fyi to Jayne, Allison, and Helen) – thanks again for all the input on the pesticides comments and the good dialogue yesterday on pesticides in Oregon CZARA. I really appreciate the input.

As we discussed, the next step is to group similar comments to help us figure out which of them relate to our decision. Here are a few steps:

1. Grouping Comments:
  - a. Look at Response to Comments DRAFT 060514 to see a sample of the type of format we're looking at.
  - b. Check out Categories of Comments Word to see list of possible subcategories which we'll use to group. Feel free to send me comments on this grouping, but let's start with this, and we can refine if it doesn't work.
  - c. Open XL Spreadsheet of Coded Public Comments – pesticides. This is a compiled list of all of our work with all other comments deleted. Assign 1 or more categories to your assigned comments (color-coded).
2. Meetings
  - a. The CZARA Tech Team meets on Tuesday, July 1 at 10AM PST/11AM Mountain where I'll summarize where we are on pesticides. The call-in is Non-Responsive Up to you whether you want to call in, but you're welcome to.
  - b. I'll send out an invite for another time for our group to look at compiled comments, most likely July 7 or 8.

Lastly, references! The following should be helpful for more background. Luckily, these are all posted online, so they're

easy to access.

1. EPA/NOAA determinations on thresholds for pesticides. I only found specific reference to pesticides thresholds in the 1998 and 2013 documents. Will follow up.
  - a. 1/13/98 Conditional Approval Findings, Sections IIB, III, and X. <http://coastalmanagement.noaa.gov/nonpoint/docs/findor.txt>
  - b. 1/12/2004 Draft NOAA and EPA Preliminary Decisions on Information Submitted by Oregon (Section II, ag-pesticides) <http://coastalmanagement.noaa.gov/nonpoint/oregonDocket/References%20C-14%20OR%20Interim%20Ltr%201-13-04.pdf>
  - c. 12/21/12 NOAA and EPA Findings aka "Christmas Letter" (not able to find info on pesticides) <http://coastalmanagement.noaa.gov/nonpoint/oregonDocket/References%20C-7%20CZARA%20Initial%20Written%20Assessment%20Final%2012-21-12.pdf>
  - d. 12/20/13 NOAA and EPA Proposed Disapproval Findings, Sections IC, IIA. <http://coastalmanagement.noaa.gov/nonpoint/oregonDocket/OR%20CZARA%20Decision%20Doc%2012-20-13.pdf>
2. EPA/NOAA Guidance for Approval Thresholds - <http://coastalmanagement.noaa.gov/nonpoint/oregonDocket/default.html>
  - a. See Reference B7, B9, B12, B13.
3. State Program Documents - <http://coastalmanagement.noaa.gov/nonpoint/oregonDocket/default.html>
  - a. Pesticide Regs and State Programs – Reference A12, A13, B1
  - b. State Rationale on Pesticides – C2, pages 27-31;
  - c. State response to 12/20/13 Decision; Pages 32-36; Appendix A, pages 65-70  
<http://coastalmanagement.noaa.gov/nonpoint/oregonDocket/StateofOregonCZARAsubmittal3-20-14.pdf>
4. Pesticide-Related Litigation Links
  - a. ODA website with good overall background on pesticide buffers <http://www.oregon.gov/ODA/PEST/pages/buffers.aspx>
  - b. Federal Register Notice: <http://www.regulations.gov/#!documentDetail;D=EPA-HQ-OPP-2014-0301-0001>
  - c. Stipulated Settlement Agreement: <http://www.regulations.gov/#!documentDetail;D=EPA-HQ-OPP-2014-0301-0002>

Thanks, and let me know if you have questions. Alan is also a great resource. I'll try to work on mine and send out a draft that we can build on. Have a great weekend,

Jenny Wu

USEPA Region 10

Office of Water and Watersheds (OWW-134)

Environmental Engineer, Watershed Unit

1200 6th Avenue, Suite 900

Seattle, WA 98101

(206)553-6328